

2020 Investment Adviser Written Examination

Organization CRD/IARD: *

Investment Advisory Firm Name: *

Firm d/b/a/ Name:

Business Address: *

Street Address

Street Address Line 2

City

State / Province

Postal / Zip Code

Country

Phone Number: *

Contact Person: *

Contact Person Email Address: *

example@example.com

Business

1. Does your advisory firm engage in the solicitation of business for other investment advisers, whether or not compensation is received? *

Yes

No

a. Investment Advisers on whose behalf you solicit clients (please provide the name(s) and CRD/IARD number(s), if applicable): *

2(a). Does your advisory firm engage other individuals or firms to solicit on your firm's behalf? *

Yes

No

If Yes, provide the name of the individual(s)/firm(s) who solicit on your advisory firm's behalf (please provide the name(s) of the individual or firm and the corresponding CRD/IARD number(s), if applicable): *

2(b). Does your advisory firm use any robo-adviser or similar technology tools on behalf of your clients? *

Yes

No

If Yes, provide the name of the robo-adviser or similar technology tools: *

3. Does your advisory firm offer financial planning services? *

Yes

No

4. Does your firm or any affiliated person, including any investment adviser representative, principal or other entity under common control, sell life insurance or any type of annuity product? *

Yes

No

5. Does your advisory firm offer asset management services? *

Yes

No

If Yes, provide the following:

a. Total value of "assets under management" as of December 31, 2019 in USD: *

"Assets Under Management" is a defined term. [See glossary.](#)

b. % of your advisory firm's 2019 revenues from asset management services: *

c. % of your client's AUM in the following types of investments as of December 31, 2019:

1. Equities *

0%
1-10%
11-25%
26-50%
51-100%

2. Bonds *

0%
1-10%
11-25%
26-50%
51-100%

3. Mutual funds *

0%
1-10%
11-25%
26-50%
51-100%

4. Money Market Mutual funds, cash or similar liquid cash equivalents *

0%
1-10%
11-25%
26-50%
51-100%

5. Exchange Traded Funds (ETFs), excluding non-traditional ETFs like leveraged, inverse, and volatility products *

0%
1-10%
11-25%
26-50%
51-100%

6. Leveraged, Inverted, and/or Volatility ETFs *

0%
1-10%
11-25%
26-50%
51-100%

7. Options, including Binary Options *

0%
1-10%
11-25%
26-50%
51-100%

8. Microcap Stocks (i.e., "Penny" Stocks) *

0%
1-10%
11-25%
26-50%
51-100%

9. Natural Resources and Precious Metals *

0%
1-10%
11-25%
26-50%
51-100%

10. Viatical Settlements *

0%
1-10%
11-25%
26-50%
51-100%

11. Gold Bullion *

0%
1-10%
11-25%
26-50%
51-100%

12. Foreign Currencies *

0%
1-10%
11-25%
26-50%
51-100%

13. Privately Placed and/or Unregistered Securities (including those for which no secondary market exists or that are restricted from being resold). *

0%
1-10%
11-25%
26-50%
51-100%

14. Entertainment Investments (including films, theater productions, infomercials, and web-based entertainment providers). *

0%
1-10%
11-25%
26-50%
51-100%

15. Non-publicly traded alternative investments including REITs, business development companies, oil and gas programs, equipment leasing programs, commodity pools or similar direct investment programs but excluding federally and state exempt private offerings. *

0%
1-10%
11-25%
26-50%
51-100%

16. Asset-Backed Securities (including collateralized mortgage obligations) and/or Insured or Guaranteed Promissory Notes. *

0%
1-10%
11-25%
26-50%
51-100%

17. Church Bonds *

0%
1-10%
11-25%
26-50%
51-100%

18. Derivative or Market-Linked Certificates of Deposit *

0%
1-10%
11-25%
26-50%
51-100%

19. Cryptocurrencies, Initial Coin offerings, or other digital assets using cryptography, blockchain or similar technologies to create currency products or trading platforms. *

0%
1-10%
11-25%
26-50%
51-100%

20. Other *

0%
1-10%
11-25%
26-50%
51-100%

d. Do you manage investor assets with discretion? *

Yes

No

If Yes, provide the following:

i. Discretionary "assets under management":

"Assets Under Management" is a defined term. [See glossary.](#)

1. As of December 31, 2019. USD *

2. As of December 31, 2018. USD *

ii. Discretionary "assets under management" for New Jersey clients:

"Assets Under Management" is a defined term. [See glossary.](#)

1. As of December 31, 2019. USD. *

2. As of December 31, 2018. USD. *

iii. Number of discretionary accounts as of December 31, 2019: *

iv. Number of discretionary accounts for New Jersey clients as of December 31, 2019: *

v. Since December 31, 2018, did your firm have any clients who transferred funds from an employer benefit plan to an IRA or other account managed by you? *

Yes

No

If Yes, for how many clients? *

6. Does your advisory firm or any of its representatives charge a performance fee defined under Bureau Regulation 13:47A-2.10? *

Yes

No

See Bureau Regulation [13:47A-2.10](#)

If Yes, enter a description or schedule if not stated in the sample advisory contract(s) you've submitted to the Bureau: *

7. Does your advisory firm execute trades on behalf of clients in an omnibus account? *

Yes

No

7(a). If Yes, describe how and when your advisory firm allocates trades in an omnibus account among clients and, if relevant, accounts for which individuals associated with the firm are the beneficial owner. *

8. Have your advisory firm's investment advisory contract(s), including contracts used for financial planning and solicitation services, changed in 2019? *

Yes

No

9(a). Have you provided clients with a copy of your brochure at or prior to entering into a contract and annually (or a summary of changes) as required by Bureau Regulation 13:47A-2.13(c)(1) and (2)? *

Yes

No

See Bureau Regulation [13:47A-2.13\(c\)\(1\) and \(2\)](#).

9(b). Have you provided clients this year the Investor Protection Information Form required by Bureau Regulation 13:47A-2.14? *

Yes

No

See Bureau Regulation [13:47A-2.14](#)

Policies and Prodecures

10. Does your advisory firm have a business continuity plan? *

Yes

No

If Yes, provide the following:

a. Does your business continuity plan include a disaster recovery plan? *

Yes

No

b. If your advisory firm has a single investment adviser representative or is a sole proprietorship, does your continuity plan include a business succession plan that designates an individual to notify clients, vendors, institutions, and regulatory bodies, including filing Form ADV-W on FINRA's IARD, in the event of the investment adviser representative's incapacity or death? *

Yes

No

N/A

COVID-19 Pandemic

11. Was your firms annual ADV amendment filed? *

Yes

No

If No,

(i) Are you relying Upon the Bureau's Emergency Order? *

Yes

No

(ii) Explain the circumstances that resulted in the delayed filing. *

(iii) When do you anticipate the filing will be made. *



Month Day Year

12(a). Did any event during 2019 or 2020 such as the Covid-19 pandemic and related business disruptions require your advisory firm to execute its business continuity plan? *

Yes

No

12(b). Did any event during 2019 or 2010 such as the Covid-19 pandemic and related business disruptions require your advisory firm to revise its business continuity plan? *

Yes

No

13(a). Have you advised customers of the steps you are taking to maintain operations and whom to contact with questions or concerns? *

Yes

No

13(b). Have you advised customers of the impact this current crisis may have on investments? *

Yes

No

13(c). Have you advised customers of any updates to offering materials? *

Yes

No

14. Are there any COVID-19 related issues or concerns you would like to disclose or discuss with the Bureau? *

Yes

No

15(a). Did you or your firm apply for and granted SBA Funding through the CARES Act which established several new temporary programs to address the COVID-19 outbreak? *

Yes

No

15(b). If Yes to (a), under which program(s) were you granted funding? Check all that apply. *

(i) Paycheck Protection Program (PPP)

(ii) Economic Injury Disaster Loan

(iii) SBA Express Bridge Loans

(iv) SBA Debt Relief

15(c) (i) If yes to (a), has the granting of these funds been disclosed in your firm's Form ADV Part 2 brochure(s)? *

Yes

No

15(c) (ii) If not, explain why not. *

SAFEGUARDING AGAINST FINANCIAL EXPLOITATION ACT ("SAFE")

On January 13, 2020, the SAFE act was enacted in New Jersey. The SAFE Act provides, in part, that qualified individuals, defined as broker-dealers and investment advisers, who believe that financial exploitation of a vulnerable adult may have occurred or been attempted, or is being attempted, shall promptly notify the Bureau and adult protective services. Further, the broker-dealer or investment adviser may delay transactions and disbursements from accounts related to the vulnerable adult when they believe that financial exploitation may be occurring or will occur, and has been properly reported. The SAFE Act became effective on April 12, 2020. See: <https://www.njconsumeraffairs.gov/bos/Pages/SAFE.aspx>

16. Are you familiar with SAFE? *

Yes

No

17. Have you read SAFE *

Yes

No

18. Does your firm have written policies and procedures related to SAFE? *

Yes

No

If no, do you plan on updating your written policies and procedures to address SAFE. *

Yes

No

19. Have you attended any training or taken continuing education related to identifying elder or vulnerable adult abuse or identifying diminished capacity? *

Yes

No

20. Does your advisory firm use a trusted contact form with clients that identifies a trusted person to contact for administering the account or in the event of financial exploitation concerns? *

Yes

No

If Yes, do you seek to do so for all clients or just certain clients such as seniors, vulnerable adults or those with diminished capacity?:

Personnel, Associated Persons and Other Activities

21. Upload a list of all current investment adviser representatives of your advisory firm as an attachment, including their accompanying CRD number(s) and any professional designations they use. *

Indicate any dual affiliations or registrations as a broker-dealer agent or investment adviser representative that any of your investment adviser representatives have with any other broker-dealer or investment advisory firm. Indicate which if any of your investment adviser representatives is licensed as an insurance provider.

22. Does any investment adviser representative of your advisory firm have a “doing business as” (DBA) name that is different from your advisory firm’s name? *

Yes

No

If Yes, provide any DBA name(s) used by each representative and state whether or not their DBA is disclosed on the CRD/IARD. *

23. Is your advisory firm’s Chief Compliance Officer (“CCO”) the same as listed in your advisory firm’s response to Item 1, part J, of the identifying information section of your most recent Form ADV? *

Yes

No

If Not, provide the name and contact information of your advisory firm’s CCO, as well as an explanation for why your response to Item 1, part J, for your Form ADV does not reflect this information. *

24. If your advisory firm does not have a CCO, indicate the designated regulatory contact for your advisory firm, with that individual’s title and contact information.

25. Does your advisory firm have any other entity which assists, or during 2019 assisted, your firm in completing and submitting any forms filed with the IARD or directly with the Bureau? *

Yes

No

If Yes, provide a list of name(s), address(es) and any other contact information for each such entity. *

26. Are there any other business activities or joint ventures conducted on your premises, such as office sharing, accounting, tax services, mortgage-related services, insurance, real estate, pension or retirement plan administration, other business advisory or consulting services, etc.? *

Yes

No

If Yes, provide a list of the services provided here: *

27. Is your advisory firm under common control or ownership with another investment adviser? *

Yes

No

If Yes, list the firm name(s) and CRD/IARD number(s), if applicable: *

28. Is any investment adviser representative of your firm associated with a broker-dealer? *

Yes

No

If Yes, provide the following:

a. Name and CRD number of each investment adviser representative of your firm and the name and CRD number of each broker-dealer with whom they are associated: *

b. Was your advisory firm ever examined by the compliance department of the listed firm? *

Yes

No

c. Date of the last exam.



Month Day Year

Complaints/Litigation/Regulatory Action/Risk Management

29. Does your firm carry errors & omissions insurance? *

Yes

No

If Yes:

a. What is the total coverage amount? *

b. What is the per claim limit? *

c. What are the total annual premiums? *

d. Does the policy cover all registered persons? *

Yes

No

Advertising and Promotional Activities

30. Does your advisory firm or any of its representatives maintain or use any website or use any social media service? *

Yes

No

31. Please list each web address or handle that your advisory firm and/or any of its representatives uses including social media websites (such as Facebook, LinkedIn, etc.), blogs, Twitter, personal websites, and business websites. Please affirmatively state that your firm does not utilize any websites, if that is the case. *

32. Does your advisory firm have policies and procedures for the use of social media by your firm and its representatives? *

Yes

No

33. Does your advisory firm conduct "seminars"? *

Yes

No

If Yes, provide details here, including the location and dates of seminars conducted in 2019, as well as the subject matter of each "seminar" and whether or not a meal was provided. *

34. Does your advisory firm use any performance figures, such as firm-wide or specific (whether or not identified) customer performance figures or charts, when marketing its services to existing or prospective clients? *

Yes

No

If Yes, describe circumstances in which marketing and/or performance figures were used in 2019. *

Custody and Financial Condition

35. Does the advisory firm, directly or through a related person, maintain "custody" and possession, or have the authority to take possession, of its client's assets in addition to or exclusive of an unrelated custodian other than for purposes of withdrawing your advisory fees when earned and due? *

Yes

No

"Custody" is a defined term. [See glossary.](#)

b. If your advisory firm is located in New Jersey, does your firm maintain net capital of at least \$35,000? *

Yes

No

Not applicable because not located in New Jersey.

c. If your advisory firm is located in New Jersey, does your firm maintain a surety bond of at least \$35,000? *

Yes

No

Not applicable because not located in New Jersey.

36. Does the advisory firm, or any of its representatives, have standing letters of authorization, power of attorney or similar arrangements, pursuant to which it may direct disbursements from a clients' account to (a) other accounts (eg. bank accounts, credit card accounts, loan accounts, etc.) owned or controlled by the client? *

Yes

No

36(b). accounts owned or controlled by any third party not the client? *

Yes

No

37. Does the advisory firm, or any of its representatives, serve as an executor, trustee, general power of attorney, or similar capacity for any client or with respect to any client account? *

Yes

No

38. Has your advisory firm or any affiliated person under common control at any time in 2019, managed or advised any pooled investment vehicle? *

Yes

No

39. In addition to any custody that your advisory firm may itself maintain, please list the name, address and CRD/IARD number, if applicable, of all custodian firms who currently or have in 2019, held client assets for your advisory firm or clients of your advisory firm. Please affirmatively state that your firm does not utilize any custodial firms, if that is the case.

40. Is your advisory firm "solvent"? *

Yes

No

"**Solvent**" is a defined term. [See glossary](#).

41. If your advisory firm is located in New Jersey and manages client assets with discretion, does it now have and at all times maintain net capital of at least \$10,000? *

Yes

No

Not applicable because firm is not located in New Jersey.

Not applicable because firm does not manage assets with discretion.

42. Does your firm or any associated person use any client's own personal login or user ID and password to access the client's account at any custodian such as a broker-dealer or a commercial bank? *

Yes

No

Acknowledgement and Signature

Is the Preparer the Chief Compliance Officer? *

Yes

No

Name of Chief Compliance Officer: *

First Name

Last Name

Phone Number: *

E-mail: *

example@example.com

Under penalties of law, I affirm by my signature or electronic submission that this information contained herein, and attached hereto, is true, complete, and current, and that I am an authorized person to submit it. *

I AFFIRM

Full Name of Preparer: *

First Name

Last Name

Title/Positon: *

Company: *

Date: *



Month Day Year

Phone Number: *

E-mail: *

example@example.com

Under penalties of law, I affirm by my signature or electronic submission that this information contained herein, and attached hereto, is true, complete, and current, and that I am an authorized person to submit it. *

I AFFIRM